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(202) 659-0830 FACSIMILE: (202) 828-5568 **AFFILIATED SOUTH AMERICAN OFFICES**

ESTUDIO JAUREGUI & ASSOCIATES BUENOS AIRES, ARGENTINA

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MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER

ARTHUR BLOOSTON 1914 – 1999 July 1, 2014

ACCEPTED/FILED

JUI 1 2014

Federal Communications Commission
Office of the Secretary

writer's contact information sta@bloostonlaw.com 202-828-5562

REDACTED - FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, DC 20554

RE:

Form 481 – Carrier Annual Reporting Data Collection, 2014 WC Dockets No. 14-58, 10-90 and 11-42

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules, ¹ Electra Telephone Company (the "Company") hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,² the Company requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment for its Five

^{1 47} CFR §§54.313 and 54.422.

² In the Matter of Connect America Fund, et al., PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 12-1857, released November 16, 2013.

No. of Copies rec'd List ABCDE

Year Service Quality Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A letter in support of the Company's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, two redacted copies and one non-redacted copy have been submitted on paper via hand delivery to the Secretary's Office, two non-redacted copies have been submitted for hand delivery to Mr. Charles Tyler of the Telecommunications Access Policy Division, and a redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Salvatore Taillefer, Jr.

Counsel to Electra Telephone Company

CC:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau

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WRITER'S CONTACT INFORMATION

Federal Communications Commission
Office of the Secretary

sta@bloostonlaw.com 202-828-5562

VIA HAND DELIVERY

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

RE:

Form 481 - Carrier Annual Reporting Data Collection, 2014

WC Dockets No. 14-58, 10-90, and 11-42

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Electra Telephone Company ("the Company"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, the Company requests confidential treatment of the Five Year Service Quality Improvement Plan (the "Plan" or "confidential information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, the Company states the following:

1. Identification of the specific information for which confidential treatment is sought.

The Company seeks confidential treatment of the Five Year Service Quality Improvement Plan, attachment 442069TX112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about the Company as well as information about the Company's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.

The documents are being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors," and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.²

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The Plan relates to voice and broadband services provided by the Company that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the confidential information is likely to result in substantial competitive harm to the Company because the confidential information could provide competitors with commercially sensitive insights related to the Company's operations, service offerings, and costs.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

The Company does not make the Five Year Service Quality Improvement Plan or any of the information contained therein publically available in any way, and further limits internal access to key employees subject to strict non-disclosure obligations.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The Company does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

¹ *Id.* § 0.457(d)(2). ² 5 U.S.C. § 552(b)(4): 47 C.F,R. § 0.457(d).

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

The confidential information should be treated as confidential for an indefinite period, as the Company will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, the Company requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

Salvatore Taillefer, Jr.

Counsel for

Electra Telephone Company

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<015>	Study Area Name	ELECTRA TELEPHONE	со		ACCEP	TED/FILED
<020>	Program Year	2015	-			1 2014
<030>	Contact Name: Person USAC should contact with questions about this data	Deborah Nobles		Ferle	JUL .	1 2014
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9046880029 ext.		·	Office of th	cations Commission ne Secretary
<039>	Contact Email Address: Email of the person identified in data line <030>	dnobles@townes.net				
ANNUA	AL REPORTING FOR ALL CARRIERS				S4.313 Completic Required	Required
<100>	Service Quality Improvement Reporting		(complete attached worksh	eet)	(check box	when complete)
<200>	Outage Reporting (voice)		(complete attached worksh	eet)	CONTRACTOR S	
<210>		outages to report			V	STATE OF THE PARTY
<300>	Unfulfilled Service Requests (voice)					
<310>	Detail on Attempts (voice)					1111111
				(attach descriptive	document)	
<320>	Unfulfilled Service Requests (broadband)		***	ea -	~	THE STATES
	5.1]		2000000
<330>	Detail on Attempts (broadband)			(attoch descriptiv	e document)	10.00 10.00 10.00
<400>	Number of Complaints per 1,000 customers (voice)			1		
<410> <420>	Fixed 0.0 Mobile				~	
<430>	Number of Complaints per 1,000 customers (broads	pand)			- V	NAME OF THE PARTY
<440>	Fixed 0.0					
<450> <500>	Service Quality Standards & Consumer Protection R	ules Compliance	(check to indicate certifica	tion)		
<510>	442069tx510.pdf		(attoched descriptive do	cument)	V	· ·
<600>	Functionality in Emergency Situations	=======================================	(check to indicate certifica	tion)	·	
	442069tx610.pdf]	NAME.		
			(attached descriptive docum	nent)		
<610>	1					
<700>	Company Price Offerings (voice)		(complete attached works)	heet)	~	1111111
<710>	Company Price Offerings (broadband)		(complete attached works)			all like
<800> <900>	Operating Companies and Affiliates Tribal Land Offerings (Y/N)?	Of	(complete attached works) yes, complete attached works)			THE SECTION ASSESSMENT OF THE PERSON ASSESSMEN
	Voice Services Rate Comparability 442069tx1010.pdf		(check to indicate certificate		~	11.11.11.
<1010>			(attach descriptive docum	ent)	~	
<1100>	Terrestrial Backhaul (Y/N)?	69	f not, check to indicate certifica	ation)		MANNE.
<1110> <1200>	Terms and Condition for Lifeline Customers		(complete attached works)		STATE OF	
	Price Cap Carriers, Proceed to Price Cap Additional	Documentation Works				
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<2000> <2005>			(check to indicate certificat (complete attached worksh			CONTRACTOR OF THE PARTY OF THE
-2005	Rate of Return Carriers, Proceed to ROR Additional					100000
<3000> <3005>	REDACTED	- FOR PUBL	Colors to Indicate certificat	ÖN	~	16 16 16 16 10 10

	rvice Quality improvement Reporting flection Form	FCC Form 481 OMB Control No. 3060-0986/QMB Control No. 3060-0819 July 2013
<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) O •
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes/no) O O
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your con CETC which only receives frozen support, your progress report is only required to address voice telephony service.	mpany is a
	Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
<115>	How (USF) was used to improve service quality	
<116>	How (USF)was used to improve service coverage	
<117>	How (USF) was used to improve service capacity	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	

<220>

[200] Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net

Dutage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of		044 5 - 11141		Did This Outage	<g></g>	<h>></h>
			\$1030	Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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							-			

(700) Pri Data Col	ce Offerings Including Voice Rate Da lection Form	FCC Form 481 (0 MB Control No. 3060-0986/OMB Control No. 3060-0819.) 10ly 2013
<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015

Deborah Nobles 9046880029 ext.

dnobles@townes.net

<701> Residential Local Service Charge Effective Date 1/1/2014
<702> Single State-wide Residential Local Service Charge

<035> Contact Telephone Number - Number of person identified in data line <030>
<039> Contact Email Address - Email Address of person Identified in data line <030>

<030> Contact Name - Person USAC should contact regarding this data

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State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
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<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net

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State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select
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			See attac worksheet -	hed				

	erating Companies		10.00		## (A) 	FCC Form 281 OMB Control No. 3060 July 2013	0-0986/OMB Control No. 3060-0819
<010>	Study Area Code		442069			3200	
<015>			ELECTRA TELEI	PHONE CO		-> > 1	
<020>	Program Year		2015			Hilling to the last of the last	The second of th
<030>		USAC should contact regarding this data	Deborah Noble	03			
<035>		nber - Number of person identified in data line <030>	9046880029 e	xt.			
<039>	Contact Email Address -	Email Address of person identified in data line <030>	dnobles@town	es.net			
<810>	Reporting Carrier	Electra Telephone Company					
<811>	Holding Company	Townes Tele-Communications, Inc.					
<812>	Operating Company	N/A		mmini - Samaman	mo-americano	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	WWW. THIRDING TO STATE OF THE S
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	oal Lands Reporting ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Cantrol No. 3060-0819 July 2013
<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line	
<039>	Contact Email Address - Email Address of person identified in data line	e <030> dnobles@townes.net
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	Name of Attached Document
funire	ompany serves Tribal lands, please select (Yes, No, NA) for each these boxes	
	rm the status described on the attached document(s), on line 920,	
	trates coordination with the Tribal government pursuant to	Select
	3(a)(9) includes:	(Yes,No, NA)
921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	
922>	Feasibility and sustainability planning;	
923>	Marketing services in a culturally sensitive manner;	
924>	Compliance with Rights of way processes	
925>	Compliance with Land Use permitting requirements	
926>	Compliance with Facilities Siting rules	
927>	Compliance with Environmental Review processes	
928>	Compliance with Cultural Preservation review processes	
	Compliance with Tribal Business and Licensing requirements.	——

<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
	Please check this box to confirm no terrestrial backhaul	
<1120>	options exist within the supported area pursuant to § 54.313(G)	
9	Please check this box to confirm the reporting carrier offers	
<1130>	broadband service of at least 1 Mbps downstream and 256 kbps	
42200	upstream within the supported area pursuant to § 54.313(G)	

<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year Contact Name - Person USAC should contact regarding this data	2015
<035>	Contact Telephone Number - Number of person identified in data line <030>	Deborah Nobles 9046880029 ext,
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
CHECK to		nt to 47 CFR § \$4.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in the information reported on this form and in the documents attached below is accurate.
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))	Name of Attached Document Usting Required Information
	Please check this box to confirm that the attached document(s), on line: § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and address providing access to broadband service in the preceding calendar year.	3012 contains the required information pursuant to
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	
(3013) (3014)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) If yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No)
Please	check these boxes to confirm that the attached document(s), on line 301	7, contains the required information pursuant to § 54.313(f)(2) compliance requires:
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Co	ash Flows
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
		Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, Is your company audited?	(Yes/No)
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains	
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a f	format comparable to RUS Operating Report for Telecommunications
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of C	Cash Flows
(3021)	Management letter issued by the independent certified public accountant that	performed the company's financial audit.
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.3.13(f)(2), contains:	SOLING MODERN STREET AND THE STREET
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.	
(3023)	Underlying information subjected to a review by an independent certified	
(3024)	public accountant Underlying information subjected to an officer certification.	\vdash
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of C	
	1	442069tx3026.pdf

	bon - Reporting Carrier Jection Form	FCC Form 481 OMB Control No. 3050-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

and the second s		
I certify that I am an officer of the reporting carrier; my responsibiliti recipients; and, to the best of my knowledge, the information report	나는 사람들은 사람들은 아이들 때문에 가장 아이들이 되었다. 그 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은 사람들이 되었다.	irements for universal service support
recipents, and, to the best of my knowledge, the information report	eed on this form and in any attachments is accurate.	
Name of Reporting Carrier: ELECTRA TELEPHONE CO		
Signature of Authorized Officer: CERTIFIED ONLINE		Date 06/26/2014
Printed name of Authorized Officer: Deboxah Nobles		
Title or position of Authorized Officer: Vice President of Regula	atory Affairs	76.
Telephone number of Authorized Officer: 9046880029 ext.	Same to the state of the state	
Study Area Code of Reporting Carrier: 442069	Filing Due Date for this form: 07/01/2014	

Attachments

Response to Line 112 Electra Telephone Company Study Area 442069

Initial Five-year Service Quality Improvement Plan – 47 C.F.R. §54.202(a)

Electra Telephone Company ("Electra") submits its initial five-year build-out Service Quality Improvement Plan pursuant to C.F.R. §54.202(a)(1)(ii) that specifies the proposed improvements or upgrades to Electra's network throughout its service area. In addition, Electra is providing information that includes an estimate of the population that will be served as a result of these improvements.

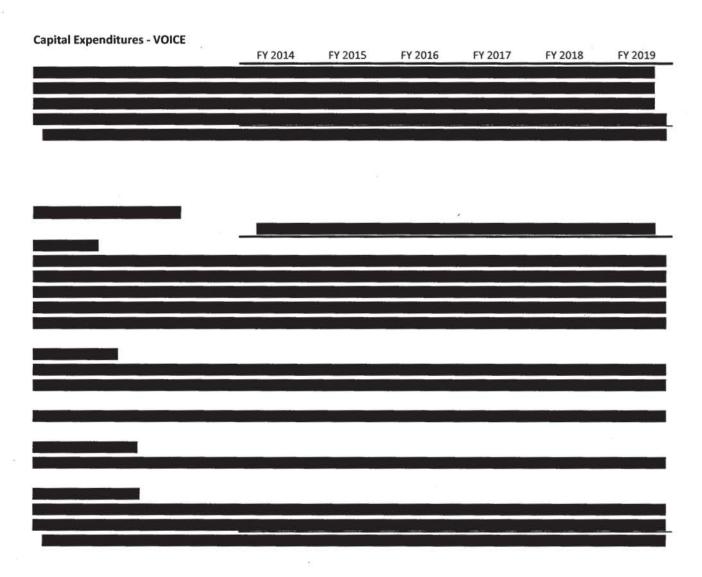
The receipt of USF support, combined with other funding sources will allow Electra to continue to meet its broadband obligations within its service area, complete service requests within a reasonable amount of time, and provide reliable, state-of-the-art, high-quality voice and broadband service, to its 974 rural customers in 1 wire center. The projects listed within this plan will be used to improve or upgrade the network over the next five years.

Data Request for FCC Annual Reporting Requirement § 54.313 (a) (1) - Five-Year Service Quality Improvement Plan July 1, 2014

Electra Telephone Company

SAC: 442069

Wire Center CLLI: ELCTTXXADSO



CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

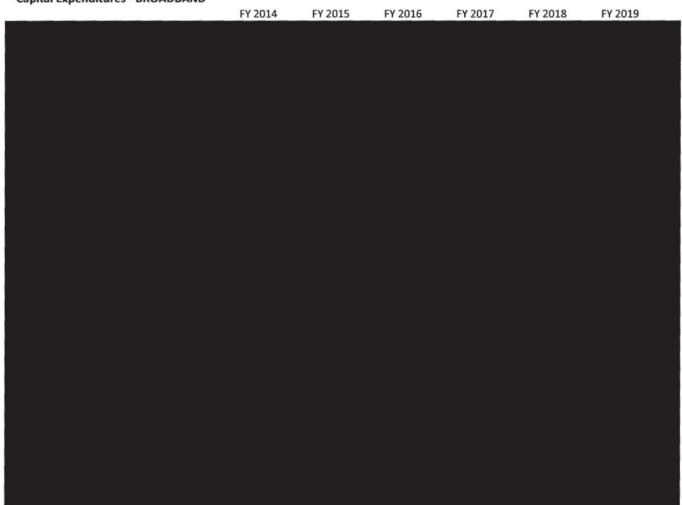
Data Request for FCC Annual Reporting Requirement § 54.313 (a) (1) - Five-Year Service Quality Improvement Plan July 1, 2014

Electra Telephone Company

SAC:

442069

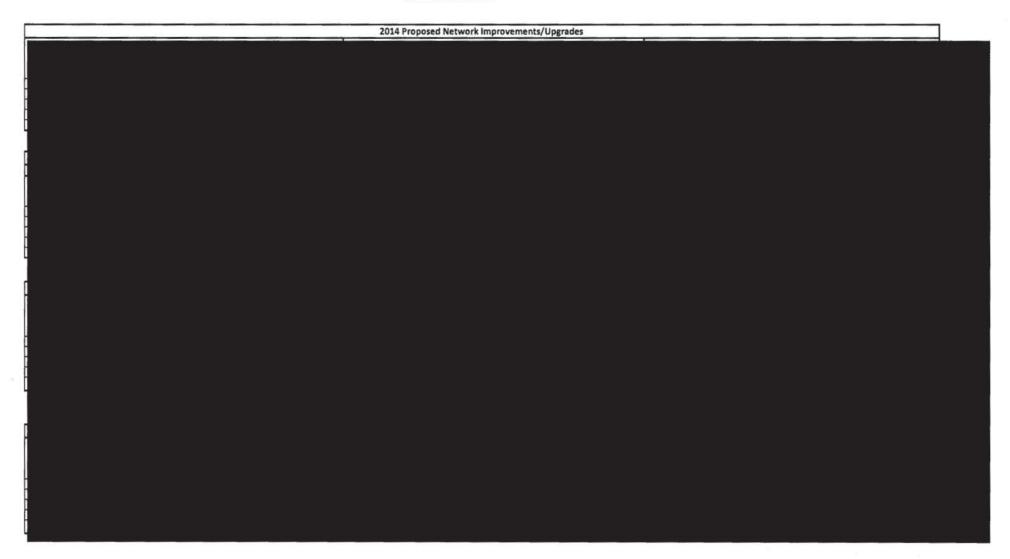
Capital Expenditures - BROADBAND



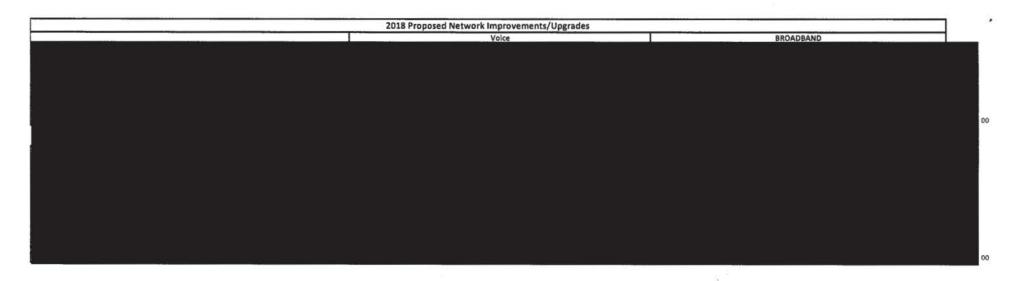
CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Data Request for FCC Annual Reporting Requirement § 54.313 (a) (1) - Five-Year Service Quality Improvement Plan July 1, 2014 Electra Telephone Company

SAC: 442069
Wire Center: ELCTTXXADSO



CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.



CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Carrier Name:

Electra Telephone Company

Carrier SPIN:

143002424 442069

Carrier SAC: Operating State:

Texas

Line 510:

Service Quality Standards and Consumer Protection Rules Compliance

Electra Telephone Company ("Electra" or "the Company") complies with the following Texas rules in Administrative Code ("TAC"), Title 16, Part II, Chapter 26 – Substantive Rules Applicable to Telecommunications Service Providers:

Subchapter B. - Customer Service and Protection §26.21- §26.37

Subchapter C. - Infrastructure and Reliability §26.51- §26.57

Subchapter F. - Regulation of Telecommunications Service §26.121 - §26.134

Quarterly Service Quality Reports are submitted by the Company to the Texas Public Utility Commission ("TPUC") in accordance with Subchapter D §26.81. The reports show that Electra has achieved the service objectives and performance benchmarks established by the TPUC.

Electra complies with the following federal consumer protection rules and regulations:

FCC 47 C.F.R. §§64.2001-64.2011 – Customer Proprietary Network Information ("CPNI")
FTC 16 C.F.R. §681.2 – Identity Theft Red Flags and Address Discrepancies Under the Fair and
Accurate Credit Transactions Act of 2003

All customer protection and disclosures established by the Fair Credit Reporting Act (15 U.S.C. §§1681, et seq.) and the Truth in Lending Act (15 U.S.C. §§1601, et seq.)

The Company has a CPNI Policy Manual detailing and enforcing the requirements of the federal CPNI rules. Each year, the CPNI Compliance Officer (1) communicates with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervises the training of Company employees and agents who use or have access to CPNI; (3) supervises the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintains records regarding the use of CPNI in marketing campaigns; and (5) receives, reviews and resolves questions or issues regarding use, disclosure, distribution or provision of access to CPNI. The CPNI Compliance Officer certifies compliance annually with the FCC by March 1.

The Company has an Identity Theft Prevention Program ("the Program") that was approved by the Board of Directors in September 2008. The Board appointed Red Flag Coordinator is responsible for updating the Program as necessary; the day-today supervision of the Program; training Company employees regarding their responsibilities with respect to the Program; and responding to employee questions and concerns regarding identity theft or the Program. The Red Flag Coordinator is required to annually prepare an Identity Theft Prevention Program Compliance Report for the Board's approval by October 1. The Identity Theft Prevention Program Compliance Report evaluates the effectiveness of the Program; the nature and extent of the Company's service provider arrangements and their impact on the effectiveness of the

Carrier Name:

Electra Telephone Company

Carrier SPIN: Carrier SAC: 143002424 442069

Operating State:

Texas

Line 610:

Functionality in Emergency Situations

Electra Telephone Company ("Electra" or "the Company") has an Emergency Operations Plan ("EOP" or "the Plan") in accordance with Substantive Rule §26.51(b) of the Texas Public Utility Commission's rules applicable to telecommunications providers, that addresses the requirements for continuity of service and systematic restoration of service after loss of service due to an emergency. The EOP is administered and maintained by a member of senior management of the parent company, Townes Telecommunications, Inc., and is reviewed annually to ensure that each applicable section is accurate and any changes or updates to the Plan are made on a timely basis.

An Emergency Director has been authorized to implement the provisions of the EOP. The Emergency Director conducts training with employees and is responsible for ensuring that all new employees are provided a 30 minute overview of the Plan as part of their orientation. Specific supervisory personnel receive additional intense instructions regarding special areas of the Plan. Annual Tabletop Drills are conducted, in which company personnel are required to run through an emergency scenario, activating the emergency response and service restoration plan.

The Plan established an Emergency Committee made up of senior management and key company personnel, who upon notification by the Emergency Director that a potential emergency exists, convene to declare an emergency, notify affected parties and assume control of restoration of service efforts.

An emergency control center is established at the Company's business office, which is equipped with a back-up power generator and a wireless telephone set. Depending upon the severity and type of emergency and the safety of the emergency location, a control center may be established at the site of the event.

In case of power outages, batteries in the central office will last on average from 4-8 hours depending on how many lines (AMP load) are served at that particular location. The stand-by generator has 24 hour diesel capacity and small generators are available to be put on smaller concentrators if power is lost. The small generators have to be refueled every few hours.

Program; reports any significant incidents involving identity theft and the Company's response to such incidents; and provides recommendations to the Board for periodic reviews of the Program and the adoption of material changes and other revisions, modifications and updates to the Program.

THE PERSON NAMED IN	ce Offerings including Voice Rate Data laction Form	FCC-Form 481 OMB Control No. 3060-0986/QMB Control No. 3060-0819 July 2013
<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
<701> <702>	Residential Local Service Charge Effective Date 1/1/2014 Single State-wide Residential Local Service Charge	

<703>

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State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
	ELECTRA	JAC (CETC)	FR FR		0.0	0.54	3.5	15.19
TX	Libborier		IK	11.15	0.0	0.54	3.5	15.19
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[710] Broadband Price Offerings - FCC Form 481 Data Collection Form - OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles8townes.net

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TX	ELECTRA	0.0	0.0	0.0	4.0	1.0	0.0	Other, No Usage Allowance
							48-41100-3-8-3-1-3-1-3	
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	erating Companies ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819
o de la constante de la consta			July 2013
<010>	Study Area Code		442069
<015>	Study Area Name		ELECTRA TELEPHONE CO
<020>	Program Year		2015
<030>	Contact Name - Person	USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address -	Email Address of person identified in data line <030>	dnobles@townes.net
<810>	Reporting Carrier	Electra Telephone Company	
<811>	Holding Company	Townes Tele-Communications, Inc.	
<812>	Operating Company	N/A	

Affiliates	SAC	Doing Business As Company or Brand Designation
ETCs:		
Choctaw Telephone Company	421893	N/A
Electra Telephone Company	442069	N/A
Haxtun Telephone Company	462190	N/A
MoKan Dial, Inc Kansas	411807	N/A
MoKan Dial, Inc Missouri	421807	N/A
Northeast Florida Telephone Company	210335	NEFCOM
Pymatunng Independent Telephone Company	170200	N/A
Tatum Telephone Company	442150	N/A
Walnut Hill Telephone Company	401729	N/A
Broadband Internet Access Providers:		
MoKan Communications, Inc.		N/A
NEFCOM Long Distance, Inc.		NEFCOM Communications, Inc.
PT Communications		N/A

Response to Line 1010 Electra Telephone Company Study Area No. 442069

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Electra Telephone Company ("Electra") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$46.96 as specified in Public Notice DA 14-384 issued on March 20, 2014. Electra's current total monthly local end-user rate¹ of \$15.19, which is made up of a monthly basic local residential rate of \$11.15 plus a mandated monthly state USF fee of \$0.54 and mandatory monthly extended area service charges of \$3.50, is not above the standard deviation as specified in the USF/ICC Transformation Order. 2

Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Carrier Name:

Electra Telephone Company

Carrier SPIN:

143002424

Carrier SAC: Operating State: 442069 Texas

Line 1210:

Terms and Conditions for Lifeline Program Customers

Electra Telephone Company ("Electra" or "the Company") complies with the FCC CFR 47 §§54.4, Universal Service Support for Low-Income Customers and the Texas Administrative Code, Title 16, Part 2, chapter 26, subchapter P, rule 26.412 – Lifeline Service program. The Company has developed a Lifeline Program Policy & Procedures Manual, which incorporates both the federal and state Low-Income Program requirements. Lifeline is a non-transferable retail service offering for which qualifying low-income consumers receive a \$9.25 federal discount and a \$3.50 state discount on flat rated basic local telephone service, whether it is purchased on a stand-alone basis or as part of a bundled service that includes voice and data services and optional calling features. Lifeline customers are charged a separate charge for toll calls, but are provided Toll Blocking free of charge if they elect to subscribe to the service. The Lifeline supported services are as shown below:

	Electra	
Residence Access Line	11.15	
ELCS	3.50	
Federal SLC	6.50	
Total Monthly Rate	21.15	
Lifeline Discounts to Total Monthly Rate:		
Federal Flat Rate Lifeline Support	(9.25)	FCC 497: Lifeline Worksheet
State Lifeline Support	Not concern	Form RMT-1" TUSF Worksheet
Total Lifeline Service Monthly Rate	(12.75)	

Additional Services:

Toll Blocking is free to Lifeline customers who subscribe to this service.

The company is required to include the Lifeline Service Program in their Local Exchange Tariff. The rates for basic local residential service are also contained in the Local Exchange Tariff and the rates for the federal SLC are included in the NECA Tariff No. 5. Changes to any of these rates must be approved by the appropriate regulatory agency.

3005b IncomeStatement				
Current Value For Total Fixed Charges (26)	Error Status		
Prior Year	21	Value is valid.		
This Year	10	Value is valid.		

	Number of fields with invalid data	
3005a BalanceSheet	0	
3005b IncomeStatement	0	
3005c Cashflow	0	

)	Mandatory fields that are blank			
Worksheet	Input Item	Line Item	Error Status	
3005a BalanceSheet	Study Area Code	<010>	OK	
3005a BalanceSheet	Study Area Name	<015>	OK	
3005a BalanceSheet	Program Year	<020>	OK	
3005a BalanceSheet Contact Name - Person USAC should contact regarding this data		<030>	ок	
3005a BalanceSheet	Contact Telephone Number - Number of person identified in data line <030>	<035>	ок	
3005a BalanceSheet	Contact Telephone Email Address - Email Address of person identified in data line <030>	<039>	ox	
3005c Cashflow	Explanation for cell C20	5	OK	277
3005c Cashflow	Explanation for cell C39	22	OK	
3005c Cashflow	Explanation for cell C45	27	OK	

Totals that can not be zero				
Worksheet	input item	Line Item	Error Status	
3005a BalanceSheet	Total Assets	24	OK	
3005a BalanceSheet	Total Liabilities and Equity	59	OK	
3005b IncomeStatement	Input items for prior year		ок	
3005b IncomeStatement	Input items for current year		OK	

John Control No. 3960-0986 July 2013 ADV 2014 ADV 2013 ADV 201				-			
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CERTIFICATION We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief. Date	Filed as subsidiary of reviewed consolidated con	npany		-	Filed as subsidiary of audited consolidated company	· ·	-
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CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

(3005b) Operating Report for Privately-Held Rate of Return Carriers FCC Form 481 Balance Sheet - Data Collection Form OMB Control No. 3060-0986 Page 2 of 3 July 2013 <010> Study Area Code <010> 442069 <015> Study Area Name <015> Electra Telephone Company <020> Program Year <020> 2015 <030> Contact Name - Person USAC should contact regarding this data <030> Deborah Nobles <035> Contact Telephone Number - Number of person identified in data line <030> <035> 904-688-0029 <039> Contact Telephone Email Address - Email Address of person identified in data line <030> <039> dnobles@townes.net

PART B. STATEMENTS OF INCOME AND RETAINED EARINGS OR MARGINS				
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CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

(3005c) Operating Report for Privately-Held Rate of Return Carriers Balance Sheet - Data Collection Form Page 3 of 3

<010> Study Area Code

<015> Study Area Name

<020> Program Year

<030> Contact Name - Person USAC should contact regarding this data

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Telephone Email Address - Email Address of person identified in data line <030>

FCC Form 481

OMB Control No. 3060-0986

July 2013 <010>

442069

<015> Electra Telephone Company

<020>

2015

<030> Deborah Nobles

<035> 904-688-0029

<039> dnobles@townes.net

PART C. STATEMENTS OF CASH FLOWS

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Electra Telephone Company, Inc. 505 Plaza Circle Suite 200 Orange Park, Florida 32073

904-688-0017 (Fax) 904-688-0049

George Frederick CPA PLLC	
7807 E Oberlin Way	
Scottsdale, AZ 85266	
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Page 2 of 3



CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Page 3 of 3